

United States Department of the Interior NATIONAL PARK SERVICE

Virgin Islands National Park 1300 Cruz Bay Creek St. John, VI 00830



September 20, 2021

Jean-Pierre L. Oriol Commissioner USVI Department of Planning & Natural Resources Charles Wesley Turnbull Regional Library 4607 Tuta Park Mall St. Thomas, VI 00802 SEP 28 2021

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Subject: Federal Consistency Determination, Coastal Zone Management, Repair the Red Hook Administration Building Damaged by Hurricanes Irma and Maria, Virgin Islands National Park, St. Thomas, US Virgin Islands (PMIS 244626)

Dear Commissioner Oriol:

The National Park Service (NPS) is submitting this Coastal Zone Consistency Determination request for the Repair of the Red Hook Administration Building Damaged by Hurricanes Irma and Maria at Virgin Islands National Park (Park), St. Thomas, US Virgin Islands (Attachment A, Figure 1).

The park is proposing to repair and rehabilitate the Red Hook Administration Building, which was impacted by Hurricanes Irma and Maria in 2017. The Administration Building is eligible to be listed on the National Register of Historic Places (NRHP). Severe damage was caused by hurricane force winds, storm surge, tornadoes, and the displacement of inanimate objects.

Pursuant to Section 307 (c) (1) of the Federal Coastal Zone Management Act of 1972 as amended, the NPS as the federal agency has determined that the proposed project is consistent to the maximum extent practicable with the enforceable policies of U.S. Virgin Islands federally approved Coastal Management Program. This determination is based on review of the proposed project's conformance with U.S. Virgin Islands coastal management program policies, which are primarily found in Virgin Islands Code, Title Twelve Conservation, Chapter 21 § 903(b). Details of the determination are provided through submission of the attached figures (Attachment A), Coastal Zone Consistency Determination (Attachment B), and Permit (Attachment C).

A full description of proposed repairs is provided in Attachment D, *Draft Design Development Drawings, Repair Red Hook Administration Building* (June 2021). Repairs for this facility include site cleanup and repair or replacement of the following: roofs, structural members and components, electrical distribution equipment, electrical devices, light fixtures, air conditioning units, plumbing piping, plumbing fixtures, windows, doors, walls, ceilings, interior finishes, exterior finishes, stormwater cisterns, and flooring (Attachment D).

The proposed action protects and preserves NPS office space, including preventing further deterioration of this property resulting from the hurricane damage and providing additional resiliency to future storms, including new windows, doors, and roofing that meets FEMA and wind code guidance. The project protects, maintains, preserves and, where feasible, enhances and restores the overall quality of the environment in the coastal zone.

The project approach is primarily to address hurricane damage and upgrade building systems to make the facility habitable and more resilient to future storm damage. Where building systems require complete repair or replacement, the recommendations reflect aligning the repaired or replaced systems with currently adopted laws, policies, building codes and NPS Denver Service Center (DSC) development standards.

The Red Hook Administration Building is located on St. Thomas in the Red Hook area on the east side of the island. The facility is a single-story building that was formerly used for administration purposes. This facility was badly damaged by the hurricanes and has not been in use for many years. The existing facility exterior envelope consists of concrete or concrete masonry unit wall with stucco or paint finish. The roof construction consists of wood decking with an unidentifiable covering due to a high state of deterioration on wood and steel roof structure. Damages sustained during the hurricane include roof damage, damage to exterior walls, and interior flooring and walls. The NPS proposes both architectural replacements and structural system replacements.

The NPS is requesting acknowledgement of the US Virgin Islands Department of Natural Resources concurrence with this consistency determination. In addition, the proposed administration building repairs would have minimal potential for environmental impact; and is consistent with the requirements of Virgin Islands Code, Title Twelve Conservation, Chapter 21 § 903(b) and applicable permits that may be considered applicable to construction activities required to repair the hurricane damage at the Red Hook Administration Building, specifically a Repair and/or Maintenance Waiver.

Croft Associates is the authorized permitting agent for the NPS and should be contacted with any matters pertaining to this permit waiver application and subsequent review/approval. The project manager, Mr. Chuck Baxter, AIA, CDT, LEED AP BD+C, can be reached at 770-529-7714 or by email at cbaxter@croftae.com.

Thank you for your time and attention to this project. We look forward to working with you to obtain the necessary approvals to proceed with construction of the project.

Sincerely,

Nigel A. Fields Superintendent

cc: Jenny Rebenack, DSC Jami Hammond, Region

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Enclosures: Attachment A – Figures

Attachment B - Federal Consistency Determination

Attachment C - Repair and/or Maintenance Waiver Application

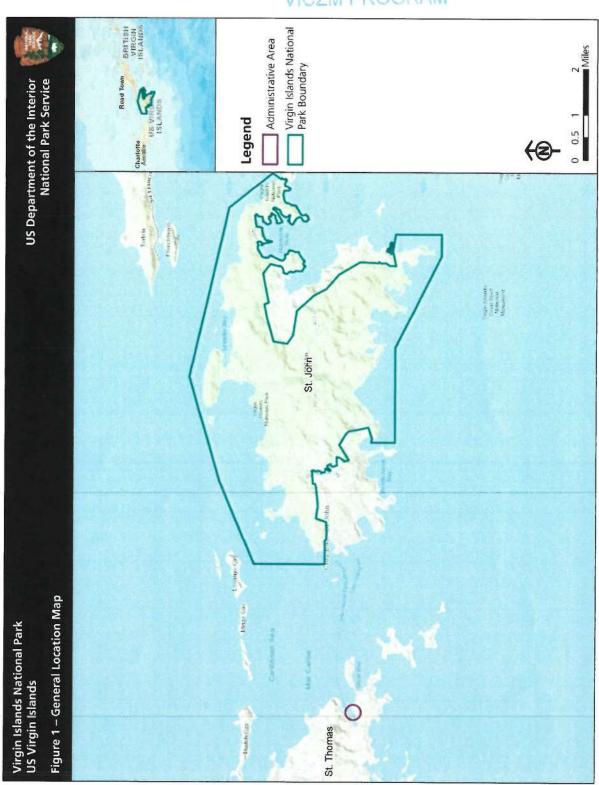
Attachment D – Draft Design Development Drawings, Repair Red Hook Administration Building (June 2021)

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Attachment B
Coastal Consistency Determination

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NATIONAL PARK SERVICE COASTAL CONSISTENCY DETERMINATION REPAIR RED HOOK ADMINISTRATION BUILDING DAMAGED BY HURRICANES IRMA AND MARIA, VIRGIN ISLANDS NATIONAL PARK, ST. THOMAS, US VIRGIN ISLANDS

This document provides the US Virgin Islands with the National Park Service (NPS) Consistency Certification and necessary data and information under Coastal Zone Management Act (CZMA) Section 307 (c) (3) (A) and 15 CFR Part 930, sub-part D, for the Virgin Island National Park Repair of Red Hook Administration Building damaged by Hurricanes Irma and Maria.

Virgin Islands National Park is federal property and is therefore excluded from coastal zone as required by Section 304 of the CZMA. However, federal actions on excluded federal lands that have potential to affect any territorial land or water use, or natural resource of the coastal zone would still need to be consistent with the territory's federally approved Coastal Management Program to the maximum extent practicable. Therefore, in accordance with the CZMA, the NPS is demonstrating consistency with the U.S. Virgin Islands Policies (USVI) of the Virgin Islands Coastal Zone Management Act of 1978, 12 V.I.C. § 901 (2012). Supporting information addressing consistency responses to the US VI Policies are provided in this Federal Consistency Determination. The NPS is requesting acknowledgement of the USVI Department of Planning and Natural Resources concurrence with this consistency determination.

INTRODUCTION

The Virgin Islands National Park, located in the US Virgin Islands on the island of St. John, encompasses approximately 60% of the land area on the island and approximately 5,500 acres of ocean surrounding the island. The NPS Red Hook Administration Building, located on St. Thomas, was impacted by Hurricanes Irma and Maria. Severe damage was caused by the hurricane force winds, storm surge, tornadoes, and the displacement of inanimate objects. This project is intended to repair the Park Administration Building damaged by the Hurricanes.

This project will repair and renovate the Administration Building located at Red Hook, add a new two stall vault toilet, add a pedestrian walkway connection from the Administrative Building to the parking lot, and repave the existing roadway and parking lot. The Administration Building and the new Comfort Station will meet the Architectural Barriers Act Accessibility Standard (ABAAS) requirements for accessibility. The pathways from the handicapped parking to each structure and to the picnic area will also be ABAAS compliant.

The Administration Building provides office space for park staff on St. Thomas and also provides office space for emergency response teams in the event of hurricanes and other emergencies. During hurricanes, offices on St. John can be damaged and unusable, an office on the island provides flexibility to manage emergency response while facilities on St. John are being restored.

The design will be cost, energy and space efficient and provide necessary code compliant fire protection. The Mission 66 era building is eligible for historic listing; therefore, proposed improvements must minimize impacts to the building's character. Exterior finishes will maximize sustainability and minimize visual intrusion. The repaired structure will connect to existing utility

lines and will provide the required compliance with Architectural Barriers Act Accessibility Standards (ABAAS).

COASTAL ZONE POLICIES:

The following eleven policies are set forth in the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b).

POLICY (1) - Protect, maintain, preserve and, where feasible, enhance and restore, the overall quality of the environment in the coastal zone, the natural and man-made resources therein, and the scenic and historic resources of the coastal zone for the benefit of residents of and visitors of the United States Virgin Islands.

The proposed action would rehabilitate and upgrade existing structures in Tier 1 of the coastal zone that sustained hurricane damage and are not currently habitable. The Red Hook Administration Building is eligible for the NRHP, and the proposed action will seek to protect and preserve the structure and character while providing necessary upgrades to allow for safety and resiliency. NPS is currently completing consultation with the SHPO regarding this site and will complete any necessary mitigations with the SHPO. All construction activities will use best management practices to minimize disturbance.

The proposed action protects and preserves NPS office space, including preventing further deterioration of this property resulting from the hurricane damage and providing additional resiliency to future storms, including new windows, doors, and roofing that meets FEMA and wind code guidance. The project protects, maintains, preserves and, where feasible, enhances and restores the overall quality of the environment in the coastal zone.

The Red Hook Administration Building will also be used as an incident command center after hurricanes and earthquakes, which provide a means of emergency access to both U.S. Virgin Islands residents and visitors. St. Thomas has a major airport and port, which St. John does not have. St. Thomas is the center of emergency response since resources and personnel can easily reach St. Thomas. Resources are then taken, primarily by boat, to St. John during emergency events. The pre-existing dock on the property, which requires no improvements, acts as a water-based access route for NPS staff and emergency responders.

The proposed action plan would also include the development of public restroom facilities to benefit and facilitate the public use of the property as well as restoration to the on-site landscaping.

The natural and manmade resources, including cultural resources, within the coastal zone will be restored to benefit the residents of the U.S. Virgin Islands and NPS staff. Therefore, the proposed action is consistent with the policy of the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b)(1).

POLICY (2) - Promote economic development and growth in the coastal zone and consider the need for development of greater than territorial concern by managing: (1) the impacts of human activity and (2) the use and development of renewable and nonrenewable resources so

as to maintain and enhance the long-term productivity of the coastal environment,

This project involves the repair of an existing building within Virgin Islands National Park and the Coastal Zone. Currently, this property is not usable due to hurricane damage, which has resulted in a shortage of office space on St. Thomas for park staff. Rehabilitation of this building would provide improved office space for park staff and an incident command center after hurricanes and earthquakes, while also protecting park resources, promoting economic development while not requiring new construction or development in the coastal zone. Administration Building upgrades will also incorporate energy-saving improvements, including upgrading the current septic system to Environmental Treatment Unit systems and updating interior and exterior lighting to more energy- and environmentally-sustainable light options. Therefore, the proposed action is consistent with the policy of the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b)(2).

POLICY (3) - Assure priority for coastal-dependent development over other development in the coastal zone by reserving areas suitable for commercial uses including hotels and related facilities, industrial uses including port and marine facilities, and recreation uses.

This project involves the repair of existing structures within the Virgin Islands National Park. Therefore, this project is consistent with this goal.

POLICY (4) - Assure the orderly, balanced utilization and conservation of the resources of the coastal zone, taking into account the social and economic needs of the residents of the United States Virgin Islands.

This project involves the repair of an existing structure within the Virgin Islands National Park that was damaged by hurricanes and is not currently usable. The rehabilitation of this property will protect resources and allow for more efficient staff presence on St. Thomas. Because this facility is used by other emergency organizations and as an emergency response center, the repaired facility will provide an economic benefit to residents of the Virgin Islands. Therefore, the proposed action is consistent with the policy of the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b)(3).

POLICY (5) - Preserve, protect and maintain the trust lands and other submerged and filled lands of the United States Virgin Islands so as to promote the general welfare of the people of the United States Virgin Islands.

The proposed action involves the repair of an existing administration building in an upland area on NPS property and does not involve any work in submerged lands. Repairs to the Administration Building would return the building to a safe condition and decrease the likelihood of misuse or accidental injury to the public. All construction activities will use best management practices to minimize disturbance and prevent erosion. Best Management Practices will be put in place to prevent shoreline erosion:

In addition, NPS will continue their mission to protect and maintain cultural, natural and marine resources within the park. Marine resource management and research within the park coastal environment will continue in partnership with the U.S. Virgin Islands to ensure the preservation

and protection of these resources. Overall, the project as designed preserves, protects and maintains the trust lands and other submerged and filled lands of the United States Virgin Islands so as to promote the general welfare of the people of the United States Virgin Islands and therefore is consistent with this policy of the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b)(5).

POLICY (6) - Preserve what has been a tradition and protect what has become a right of the public by insuring that the public, individually and collectively, has and shall continue to have the right to use and enjoy the shorelines and to maximize public access to and along the shorelines consistent with constitutionally protected rights of private property owners.

NPS Management Policies 2006 states that the enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of all National Parks. Virgin Islands National Park provides appropriate high-quality opportunities for visitors to enjoy the park. One of the park's goals is to ensure that visitors safely enjoy and are satisfied with the availability, accessibility, diversity, and quality of park facilities, services, and appropriate recreational opportunities.

The Administration Building is not generally open to the public, but the lands are open and are used regularly by local neighbors for walking and picnics, and by local schools and other local organizations for events, such as band practice. These uses would continue and the addition of a new vault toilet for public use will enhance these opportunities. Furthermore, the dock (which does not require repair), is used regularly by NPS staff and other emergency response teams. The dock has not been available for public use historically and the dock will remain unavailable for public use, retaining the area for use by NPS and local agencies. Improvements to the road, parking area and administration building will support the continued use of this area for emergency response.

The project will preserve what has been a tradition and protects what has become a right of the public by ensuring that the public, individually and collectively, has and shall continue to have the right to use and enjoy the shorelines. This project will maximize public access to and along the shorelines and therefore is consistent with this policy of the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b) (6).

POLICY (7) - Promote and provide affordable and diverse public recreational opportunities in the coastal zone for all residents of the United States Virgin Islands through acquisition, development and restoration of areas consistent with sound resource conservation principles.

The proposed action is a restoration effort for existing structures in Tier 1 of the coastal zone that sustained hurricane damage and are not currently habitable. Restoration work within the property includes the repair and rehabilitation of the Administration Building, the addition of a new and publicly available vault toilet, and the revitalization of the existing landscaping surrounding the facility. All construction activities will use best management practices to minimize disturbance.

While the grounds and public restroom will remain available for recreational use by community members, there are no plans to develop recreational opportunities for public use within the immediate waterfront. The dock on the premises (which does not require repair), is used regularly by NPS staff and other emergency response teams and will remain available only to emergency

authorities and NPS staff, and not available for public use.

POLICY (8) - Conserve ecologically significant resource areas for their contribution to marine productivity and value as wildlife habitats, and preserve the function and integrity of reefs, marine meadows, salt ponds, mangroves and other significant natural areas.

The proposed action is a restoration effort for existing structures in Tier 1 of the coastal zone would not include any actions within waterbodies. Vegetation surveys in 2021 did not identify any rare, threatened, or endangered species within the project area. All construction activities will use best management practices to minimize disturbance and prevent erosion. The Virgin Islands tree boa (Chilabothrus granti) is a federally endangered species that was identified using the US Fish and Wildlife Service's U.S. Fish & Wildlife Service Information for Planning and Consultation (IPaC) system as having the potential to occur in the project area. Because no suitable habitat for this species was found during the vegetation surveys; the National Park Service determined that this project would have no effect on the Virgin Islands tree boa (consultation code 04EC1000-2020-SLI-1562).

The project as designed will not include any work in ecologically significant resource areas and as such will conserve these areas for their contribution to marine productivity and value as wildlife habitats, and restore the function and integrity of reefs, and therefore is consistent with this policy of the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b)(8).

POLICY (9) - Maintain or increase coastal water quality through control of erosion, sedimentation, runoff, siltation and sewage discharge.

The proposed action is a repair effort for existing structures in Tier 1 of the coastal zone would not include any actions within waterbodies. All construction activities will use best management practices to minimize disturbance. Building repair efforts incorporate plumbing upgrades, which includes upgrading old facility septic systems to Environmental Treatment Unit systems as well as replacement of all piping in the Administration Building.

The project will create no sewage discharge, will improve the existing septic system and have no impact on sewage discharge.

The project as designed maintains coastal water quality through control of erosion, sedimentation, runoff, and siltation and therefore is consistent with this policy of the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b)(9).

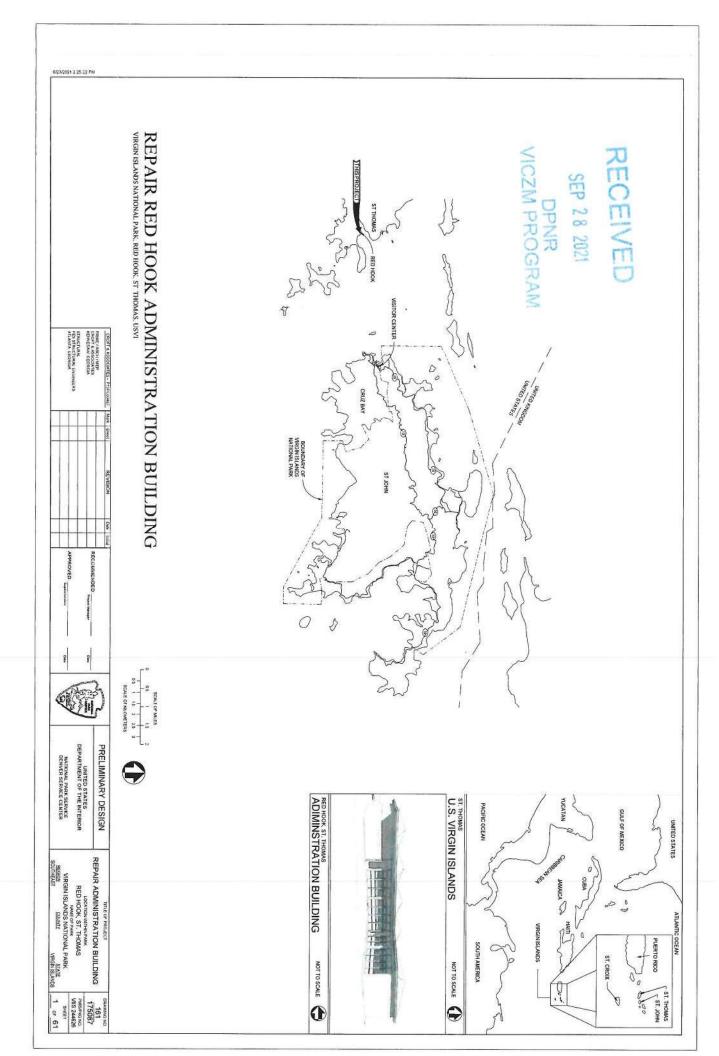
POLICY (10) - Consolidate the existing regulatory controls applicable to uses of land and water in the coastal zone into a single unified process consistent with the provisions of this chapter, and coordinate therewith the various regulatory requirements of the United States Government

The proposed project will not change any existing regulatory controls or requirements. Therefore, this goal is not applicable to this project.

POLICY (11) - Promote public participation in decisions affecting coastal planning conservation and development

Attachment B Coastal Consistency Determination

This project involves the repair of existing structures within the Virgin Islands National Park. As part of the effort to repair the Red Hook Administration building, NPS will engage with the public to inform them of proposed plans. Therefore, the project is consistent with this policy of the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b)(11).



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